REMARKS

By the present amendment and response, claims 1, 11, 20, and 30 have been amended to overcome the Examiner's objections. Claims 1-39 are pending in the present application. Reconsideration and allowance of pending claims 1-39 in view of the following remarks are requested.

The Examiner has rejected claims 1-6, 8, 9, 11-15, 17, 18, 20-25, 27, 28, 30-35, 37, and 38 under 35 USC §102(e) as being anticipated by U.S. patent number 6,281,873 B1 to David Oakley ("Oakley"). For the reasons discussed below, Applicant respectfully submits that the present invention, as defined by amended independent claims 1, 11, 20, and 30, is patentably distinguishable over Oakley. However, Applicant reserves the right to provide declarations and/or documents under 37 CFR 1.131 to "swear behind" the effective filing date of Takeda.

Subject to Applicant's reserved right to establish priority of the present invention under 37 CFR 1.131, Applicant submits that the present invention, as defined by amended independent claim 1, teaches, among other things, "a FIFO, wherein said FIFO receives said second plurality of video lines at said first frequency from said vertical scaler, said FIFO outputting said second plurality of video lines at a second frequency such that said second plurality of video lines at said second frequency are horizontally scaled." As disclosed in the present application, a vertical scaler receives a number of video lines at a first frequency and outputs an appropriately reduced number of video lines at the first frequency, which are required by, for example, an NTSC video format in the active region

of a television monitor's screen. As disclosed in the present application, the reduced number of video lines are inputted in a FIFO at the first frequency and outputted by the FIFO at a second frequency. For example, the first frequency can be 75 MHz and the second frequency can be 50 MHz.

Thus, the present invention utilizes the vertical scaler to perform "vertically scaling" to reduce the number of video lines in a high resolution video format, such as an SVGA video format, to a number of video lines required by a low resolution video format, such as an NTSC video format. Additionally, the present invention advantageously utilizes the FIFO to "horizontal scale" each of the reduced number of video lines such that each of the reduced number of video lines will fit in the active region of a monitor displaying the low resolution video format, such as the NTSC video format.

In contrast to the present invention as defined by amended independent claim 1, Oakley does not teach, disclose, or suggest "a FIFO, wherein said FIFO receives said second plurality of video lines at said first frequency from said vertical scaler, said FIFO outputting said second plurality of video lines at a second frequency such that said second plurality of video lines at said second frequency are horizontally scaled." Oakley specifically discloses a circuit for performing line rate vertical scaling of a video image, where the circuit comprises counter 12, line stores 16, 18, and 20, multipliers 24, 26, 28, and 30, decoder 38, adder 40, and FIFO memory 50. See, for example, column 5, lines 45-67, column 6, lines 1-8, column 7, lines 40-44, and Figure 5 of Oakley. In Oakley,

FIFO memory 50 is utilized in the vertical scaling circuit to evenly space every outgoing eight lines over the period of nine incoming lines to convert a VGA image to progressive scan for television. See, for example, Oakley, column 8, lines 1-4. However, Oakley fails to teach, disclose, or suggest utilizing a FIFO to provide horizontal scaling. In fact, the circuit disclosed in Oakley is only utilized for the function of vertical scaling and filtering and does not perform the horizontal scaling function. See, for example, Oakley, column 5, lines 17-20.

For the foregoing reasons, Applicant respectfully submits that the present invention, as defined by amended independent claim 1, is not suggested, disclosed, or taught by Oakley. As such, the present invention, as defined by amended independent claim 1, is patentably distinguishable over Oakley. Thus claims 2-6, 8, and 9 depending from amended independent claim 1 are, *a fortiori*, also patentably distinguishable over Oakley for at least the reasons presented above and also for additional limitations contained in each dependent claim.

The present invention, as defined by amended independent claim 11, teaches, among other things, "receiving by a FIFO said second plurality of video lines at said first frequency" and "outputting by said FIFO said second plurality of video lines at a second frequency such that said second plurality of video lines at said second frequency are horizontally scaled." Additionally, the present invention, as defined by amended independent claims 20 and 30, teach, among other things, similar limitations as amended independent claim 1 discussed above. For the same reasons as discussed above, the

invention, as defined by amended independent claims 11, 20, and 30, is not suggested, disclosed, or taught by Oakley. Thus, the present invention, as defined by amended independent claims 11, 20, and 30, is also patentably distinguishable over Oakley and, as such, claims 12-15, 17, and 18 depending from amended independent claim 11, claims 21-25, 27, and 28 depending from amended independent claim 20, and claims 31-35, 37, and 38 depending from amended independent claim 30 are, *a fortiori*, also patentably distinguishable over Oakley for at least the reasons presented above and also for additional limitations contained in each dependent claim.

The Examiner has further rejected claims 7, 10, 16, 19, 26, 29, 36, and 39 under 35 USC §103(a) as being unpatentable over Oakley. As discussed above, amended independent claims 1, 11, 20, and 30 are patentably distinguishable over Oakley. Thus claims 7 and 10 depending from amended independent claim 1, claims 16 and 19 depending from amended independent claim 11, claims 26 and 29 depending from amended independent claim 20, and claims 36 and 39 depending from amended independent claim 30 are, *a fortiori*, also patentably distinguishable over Oakley for at least the reasons presented above and also for additional limitations contained in each dependent claim.

Based on the foregoing reasons, the present invention, as defined by amended independent claims 1, 11, 20, and 30 and claims depending therefrom, is patentably distinguishable over the art cited by the Examiner. Thus, claims 1-39 pending in the present application are patentably distinguishable over the art cited by the Examiner. As such, and for all the foregoing reasons, an early Notice of Allowance for all claims 1-39 pending in the present application is respectfully requested.

Respectfully Submitted,
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